IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

CHRISTOPHER ROBINSON,)
) CIVIL ACTION NO
Plaintiff,) 2:23-cv-01381-AMM
) UNOPPOSED
v.)
)
SPRING OAKS CAPITAL, LLC;)
Fictitious Defendants "A", "B")
and "C",)
)
Defendants.)
)

DEFENDANT SPRING OAKS CAPITAL, LLC'S MOTION TO EXTEND SUMMARY JUDGMENT DEADLINE

COMES NOW the Defendant, Spring Oaks Capital, LLC and respectfully requests this Honorable Court to extend the summary judgment deadline of August 12, 2024, for both parties, and in support of this motion shows as follows:

- 1. Pending before the Court is a Motion to Strike the Confidential Designation attached to the contact between Plaintiff and her counsel. (Doc. 31). The determination of this issue will impact the exhibits used in support of Defendant's Motion for Summary Judgment.
- 2. In the Motion to Strike, the Defendant asked this Honorable Court to consider moving the summary judgment deadline for both parties, which is August

12, 2024, but erroneously listed the deadline within the Motion to Strike as

September 12, 2024.

3. Counsel for the Defendant has recognized this error and apologizes for

the confusion it caused. Because the summary judgment deadline is actually August

12, 2024, the Defendant is filing this separate motion to extend the summary

judgment deadline so that the Motion to Strike the Confidential Designation attached

to Plaintiff's contacts can be resolved first.

4. The undersigned has consulted with counsel for the Plaintiff about this

issue and the extension of the summary judgment deadlines. Counsel for Plaintiff is

in agreement that the summary judgment deadline should be extended.

5. The undersigned is very mindful of this Court's instructions in her

Initial Order regarding extensions and the circumstances under which they will be

allowed. The undersigned respectfully requests this Honorable Court to consider

this request for an extension to be timely filed and allow additional time to file

dispositive motions so that the pending Motion to Strike can first be resolved.

Respectfully submitted,

/s/ Neal D. Moore, III

Neal D. Moore, III

Attorney for Defendant,

Spring Oaks Capital, LLC

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/s/ John K. Rossman
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CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2024, a copy of the foregoing document has been served via electronic filing to the following:

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> /s/ Neal D. Moore, III OF COUNSEL